



STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

September 1, 1982

Mr. James W. Godlove
Director of Environmental Affairs
White River Shale Oil Corporation
Suite 500, Prudential Building
115 South Main Street
Salt Lake City, Utah 84111

RE: Conditional Approval
Phase I Operations
White River Oil Shale Project
ACT/047/017
Uintah County, Utah

Dear Mr. Godlove:

The thirty (30) day public comment period for the White River Oil Shale Project, managed by White River Shale Oil Corporation on behalf of Phillips Petroleum Company, Sunoco Energy Development Company and Sohio Shale Oil Company, has passed with no adverse comments being received by the Division. The Division of Oil, Gas and Mining, having received the concurrence of the Board, hereby issues conditional approval for Phase I of the White River Oil Shale Project. This approval is based upon the following conditions:

1. The operator must promise, by written response within 5 days of receipt of this approval letter, that at least 60 days prior to affecting acreage beyond the 110 acres of the first increment of Phase I, and/or prior to exceeding the time limitations (five years from approval date for the purpose of bond update), application shall be delivered to the Division for its review.

2. As previously agreed upon, a conclusive addendum package containing all final language relating to the satisfaction of each Division concern outlined in the June 30, 1982 review letter shall be provided by October 15, 1982.
3. All concerns as outlined in the July 30, 1982 submittal should be addressed according to the attached time frames.

Question 11: Further information about estimated cut and fill data should be submitted by October 15, 1982.

Question 14: The Division requests detailed subsidence mitigation plans by September 15, 1982. This plan should be determined now rather than when the occasion arises as your comments indicated.

Question 18: The disposal of ripped road pavements is contingent upon a detailed evaluation of costs for disposal. The development of the detailed costs is requested by October 15, 1982 with the further condition that the BLM and the OSO approve.

Question 23: The Division seeks to ensure, through the submission of existing data or the acquisition of new data, that no waste or muck material of a toxic or inhibitory nature exists. This shall be determined by a pH and electrical conductivity test. Data will be used to determine, in consultation with the Division, if additional testing is required. If data indicates that such material exists, measures will be developed to isolate it from sensitive areas.

Question 25: It should be understood that additional requirements may become necessary and more specific details needed at a future date earlier than that specified in the response regarding permanent closure of the portals, shafts, and declines.

Questions 30: A conditional stipulation requires the submittals of
& 31 updates and annual Operations and Progress Reports within the first quarter of each year. It should be reiterated that all reports should be submitted to the Division as soon as they are available.

Question 34: As a conditional stipulation, White River Shale Oil Corporation (WRSOC) needs to agree to the sealing of the shaft as a part of the reclamation activities during abandonment in cooperation with the Oil Shale Office or any other federal agency as applicable. This should be submitted by October 15, 1982.

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Question 36: WRSOC should understand that variance requests such as the timing for the decommissioning plan, must be submitted at least 60 days prior to approaching the Board for approval.

Question 38: WRSOC will employ the soil resource tabulation chart to keep a running account of the available topsoil, its storage duration, use and adequacy throughout the project. This chart will be updated continuously and is to be available on-site and will be submitted quarterly during peak periods of disturbance or at a minimum of yearly at other times with the Annual Operation and Progress Reports.

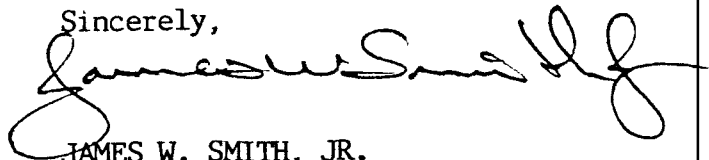
Question 40: WRSOC should commit to submitting any experimental test plot data obtained.

When written acceptance of the above conditions has been received by this office, the permit will be in full force and construction may proceed within the constraints of incremental bonding.

Please be reminded of Rule 40-8-15 of the Utah Mined Land Reclamation Act regarding reporting requirements set forth in the Annual Operations and Progress Report.

If we may assist you at any time pursuant to any of these conditions or any unforeseen changes which may be necessary on-site, please do not hesitate to call on us.

Sincerely,



JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

JWS/TLP:tck

cc: Peter Rutledge, OSO
Dave Oberwager, OSO
Ralph DeLeonardis, WRSOC
Tom Tetting, DOGM
Sue Linner, DOGM
Pam Grubaugh-Littig, DOGM
Tom Portle, DOGM

SOIL TABULATION CHART

Area in Question	Area 1	Area 2
Date final soil isopach map completed for area in question.		
Soil type (code as previously approved)		
Acreage of area		
Depth of removal (inches)		
Depth of replacement (inches)		
Volume required for reclamation (yd ³)		
Estimate volume to be salvaged (yd ³)		
Volume actually salvaged (yd ³)		
Surplus or deficit volume (yd ³)		
Storage status or term (short or long)		
Storage location (location code, description or map)		
Running total (all stockpiles)		
Short-Term		
Long-Term		